

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MARSH USA, INC., a Delaware  
corporation; and MARSH &  
MCLENNAN COMPANIES, INC., a  
Delaware corporation,

Plaintiffs,

vs.

CHAD W. KARASAKI,

Defendant.

CIVIL NO.

DECLARATION OF RONALD K.  
BEERS

08 Civ. 4195 (JGK)

DECLARATION OF RONALD K. BEERS

I, RONALD K. BEERS, declare:

1. I am a Placement Specialist and Senior Vice President with Marsh USA Inc. ("Marsh") in Honolulu, HI.
2. I have been employed with Marsh since about October 1, 2001.
3. On or about March 10, 2007, the Head of Marsh's Hawaii Office, Chad Karasaki ("Karasaki"), announced his resignation for Marsh, and his intention to accept employment with a Hawaii subsidiary of Aon Corporation, Marsh's direct and principal competitor, as the head of Aon's Hawaii operations.
4. Within a few days after Karasaki's announcement, Janet Ng ("Ng"), a Client Advisor and Vice President of Marsh in Honolulu, told me that she

was considering a move to Aon and was in discussions with Aon. She indicated that I was also on Aon's recruitment list.

5. On or about March 18, 2007, Ng announced her resignation and intention to accept employment with Aon.

6. I called Ng to confirm her resignation and tried to convince her to stay with Marsh.

7. In turn, Ng said she had made up her mind to leave and she reminded me that I was on the list of Marsh people that Aon wanted to have, and said to be ready for the call.

8. I indicated that I was happy at Marsh and told Ng again to reconsider remaining.

This declaration is made pursuant to 28 U.S.C. § 1746(2). I declare under penalty of perjury that the foregoing is true and correct.

Executed on Wednesday, April 30, 2008 at Honolulu, Hawaii.

  
RONALD K. BEERS

MARSH USA INC. ET AL. v. CHAD W. KARASAKI (SDNY);  
DECLARATION OF RONALD K. BEERS